

**EXHIBIT 2**

**DECLARATION OF JOHN C. EASTMAN**

I, John C. Eastman, pursuant to 28 U.S.C. § 1746, do declare as follows:

1. I am over 18 years of age, and have personal knowledge of the facts set forth herein.
2. On June 22, 2022, at approximately 7:15 pm, while I was walking to my car after dinner at a restaurant with my wife and a friend, was confronted by approximately 6 FBA agents.
3. One FBI agent stopped me from entering my vehicle and stated that he had a warrant to seize my cell phone.
4. I asked to see the warrant, but the agent refused. He demanded that I hand him my cell phone several times, and each time I requested first to see the warrant.
5. The FBI agents eventually conducted a pat down and then seized the phone that I was carrying.
6. Only after the seizure did the FBI executing officer provide me with a copy of the warrant. Attached hereto as Exhibit A.
7. The cell phone seized by the FBI provides access to emails that have expressly been held by a federal court to be protected by the First Amendment's Freedom of Association, the attorney-client privilege, and/or the work product doctrine.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 24, 2022

  
John C. Eastman